

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

DEVI KHODAY and DANISE
TOWNSEND, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

SYMANTEC CORP., and DIGITAL
RIVER, INC.,

Defendants.

Civil Action No. 11-CV-00180 (JRT-
TNL)

CLASS ACTION

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT, APPROVAL OF
CLASS NOTICE, AND SETTING OF
FINAL APPROVAL HEARING**

Devi Khoday and Danise Townsend (“Plaintiffs”), Plaintiffs in the above-captioned class action (the “Action”) hereby move the Court for an order (1) preliminarily approving the settlement of the case; (2) directing the dissemination of notice to the Class; and (3) scheduling a hearing to consider final approval of the settlement (“Final Approval Hearing”) and a motion for an award of attorneys’ fees and reimbursement of expenses.

The parties have entered into a proposed settlement of the above-entitled class action litigation. The terms of the Settlement are set forth in the Stipulation and Agreement of Settlement, a copy of which will be filed with the Court with other pleadings in support of this Motion.

DATED this 18th day of August, 2015

By: /s/ Karen H. Riebel

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